

June 24, 2016
B09075-0159-3542
REPA5-3542-003

Mr. Allen Wojtas
Contract Level Task Order Contracting Officer Representative
U.S. EPA Region 5
77 West Jackson Blvd. (LP-7J)
Chicago, IL 60604

Subject: EPA Contract No. EP-W-12-031, Task Order 5542, Corrective Action Support for ArcelorMittal Indiana Harbor West, Task 04. Technical Review of the May 2016 Pre-Design Work Plan (Revision 1) and Response to EPA Comments for the Former Coke Plant, ArcelorMittal Indiana Harbor West LLC, East Chicago, Indiana

Dear Mr. Wojtas:

In response to Task Order 5542 under EPA Contract No. EP-W-12-031, Task 04, Booz Allen Hamilton (Booz Allen) has conducted a technical review of the May 2016 Pre-Design Work Plan (PDWP) for the Former Coke Plant at the ArcelorMittal Indiana Harbor LLC (ArcelorMittal) West facility in East Chicago, Indiana. The PDWP outlines a scope of work for addressing lingering data gaps in contaminant delineation and evaluation of potential remedial alternatives for soil, groundwater, and light nonaqueous phase liquids (LNAPL). Booz Allen has also conducted a review of the facility's May 20, 2016 responses to EPA comments provided on March 22, 2016. Booz Allen's review focused on evaluating the technical adequacy of the PDWP and its responsiveness to EPA comments.

The PDWP also includes an Expanded Screening Level Ecological Risk Assessment (Appendix B) and a Focused Human Health Risk Assessment (Appendix C). At the request of EPA, Booz Allen has not reviewed these components of the revised PDWP or responses provided on pages 8 through 14 of ArcelorMittal's May 20, 2016 letter.

In general, the responses were acceptable with the following exceptions:

- The Conceptual Site Model provided as Figure 3 to the PDWP still does not reference potential indoor air vapor intrusion exposures to future site workers.
- The PDWP does not clearly state that, if newly installed well MW-839S also indicates the presence of LNAPL, additional step-out probes or wells will be installed until delineation is complete.

These general and additional specific comments related to our review are provided in the attachment.

If you have any questions regarding this deliverable, please contact me at (312) 827-7964 or Michele Benchouk at (215) 393-1233.

Sincerely,



Frances B. Hodge
Task Order Manager

BOOZ ALLEN HAMILTON

Enclosure

cc: Tom Matheson, EPA TOCOR
Mike Mikulka, EPA Technical Representative